

Exhibit 2—Rule 26(a) Disclosures of Both Parties

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS : CIVIL ACTION
Plaintiff, : NO. 2:19-cv-05030-JDW
-vs- :
THE MIDDLE EAST FORUM, et al. :
Defendants. :
:

Plaintiff, Lisa Barbouris, by and through her attorneys, Derek Smith Law Group, PLLC hereby respectfully submits, pursuant to Rule 26(a) et. seq. of the Federal Rules of Civil Procedure, these initial discovery disclosure as follows:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support her claims and defenses, unless solely for impeachment, identifying the subjects of the information;

Where the Address is not listed, Plaintiff does not know the address of the individual, but this information should be in the possession of the Defendants.

- **LISA BARBOUNIS** **PLAINTIFF**
Plaintiff has knowledge of all of the claims in his Complaint. Defendants are in possession of Plaintiff's contact information.
- **PATRICIA MCNULTY** **WITNESS**
Patricia McNulty witnessed several of the events averred in Plaintiff's Civil Action Complaint including the event that took place at the AIPAC conference in Washington D.C. Patricia McNulty was also in contact with Plaintiff during the events that occurred in Israel. Patricia McNulty can also provide testimony connected with the severe and pervasive discrimination and harassment to which Plaintiff was subjected by Defendants. Patricia McNulty can also provide testimony related to reports of discrimination and harassment in the workplace and retaliation. Defendants are in possession of Patricia McNulty's contact information.
- **MARNIE MEYER** **WITNESS**
Marnie Meyer witnessed several of the events averred in Plaintiff's Civil Action Complaint. Marnie Meyer can also provide testimony connected with the severe and pervasive discrimination and harassment to which Plaintiff was subjected by Defendants. Marnie Meyer can also provide testimony related to reports of discrimination and

harassment in the workplace and retaliation. Defendants are in possession of Marnie Meyer's contact information.

- **CAITRIONA BRADY**

WITNESS

Caitriona Brady witnessed several of the events averred in Plaintiff's Civil Action Complaint. Caitriona Brady can also provide testimony connected with the severe and pervasive discrimination and harassment to which Plaintiff was subjected by Defendants. Caitriona Brady can also provide testimony related to reports of discrimination and harassment in the workplace and retaliation. Defendants are in possession of Caitriona Brady's contact information.

- **DELANEY YONCHEK**

WITNESS

Delaney Yonchek witnessed several of the events averred in Plaintiff's Civil Action Complaint. Delaney Yonchek can also provide testimony connected with the severe and pervasive discrimination and harassment to which Plaintiff was subjected by Defendants. Delaney Yonchek can also provide testimony related to reports of discrimination and harassment in the workplace and retaliation. Defendants are in possession of Delaney Yonchek's contact information.

- **GREG ROMAN**

DEFENDANT

Greg Roman is a named Defendant who subjected Plaintiff to sexual harassment, sexual abuse, a sexual assault, and severe and pervasive discrimination and harassment in the workplace. Defendants are in possession of Greg Roman's contact information.

- **DANIEL PIPES**

DEFENDANT (POTENTIAL)

Daniel Pipes should be treated as a named Defendant for the purposes of discovery as Plaintiff intends to amend her First Amended Complaint to add Daniel Pipes as a named Defendant when Plaintiff's claims under the Pennsylvania Human Relations Act and Philadelphia Fair Practices Ordinance become ripe for suit. Daniel Pipes can offer testimony regarding Defendants failure to implement meaningful corrective measures subject to Defendant, Greg Roman's severe and pervasive discrimination and harassment in the workplace to which Defendant, Greg Roman subjected female staff who worked with or for The Middle East Forum including (1) Plaintiff, Lisa Barbounis, (2) Caitriona Brady, (3) Patricia McNulty, (4) Delaney Yonchek, (5) Marnie Meyer, (6) Tiffany Lee, (7) Lia Merville, (8) Alana Goodman, (9) Raquel Saraswati, (10) Samantha Mandalas, (11) Lara (last name unknown), (12) Laura Frank, and (13) Rosie (last name unknown). This is by no means an exhaustive list. Plaintiff intends to supplement this list to provide Defendants with an accurate account of the women who worked with or for The Middle East Forum who were subjected to severe and pervasive discrimination and harassment by Defendant, Greg Roman. Daniel Pipes can offer testimony regarding all of these individuals. Defendants are in possession of Daniel Pipes' contact information.

- **MATTHEW BENNETT** **DEFENDANT (POTENTIAL)**
Matthew Bennett should be treated as a Defendant for the purposes of discovery as Plaintiff intends to amend her First Amended Complaint to add Daniel Pipes as a named Defendant when Plaintiff's claims under the Pennsylvania Human Relations Act and Philadelphia Fair Practices Ordinance become ripe for suit. Matthew Bennett subjected Plaintiff to a campaign of sexual harassment and sexual advances including quid pro quo sexual harassment. Matthew Bennett also has knowledge regarding the discrimination and harassment in the workplace to which Plaintiff was subjected by Defendant, Greg Roman. Matthew Bennett also has knowledge regarding Defendant, Greg Roman's sexual misconduct, sexual abuse, and sexual harassment aimed at female individuals who worked with or for The Middle East Forum. Matthew Bennett also has knowledge regarding The Middle East Forum's policies, procedures and protocols. Defendants are in possession of Matthew Bennett's contact information.
- **GRAYSON LEVEY** **WITNESS**
Grayson Levy was employed at The Middle East Forum at the same time when Plaintiff was employed. Grayson Levy can provide relevant testimony related to the severe and pervasive discrimination and harassment to which Plaintiff was subjected by Defendants. Grayson Levey can also provide testimony related to reports of discrimination and harassment in the workplace and retaliation. Defendants are in possession of Grayson Levey's contact information.
- **SAMANTHA MANDELA** **WITNESS**
Samantha Mandela was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Samantha Mandala can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Samantha Mandela's contact information.
- **TIFANY LEE** **WITNESS**
Tiffany Lee was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Tiffany Lee can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Samantha Mandela's contact information.
- **VISILI BARBOUNIS** **WITNESS**
Visili Barbounis is Plaintiff's husband and can provide testimony regarding the way in which Plaintiff was emotionally effected by the severe and pervasive discrimination and harassment in the workplace during Plaintiff's employment with The Middle East Forum.
- **JANE REYNOLDS** **WITNESS**

Jane Reynolds is Plaintiff's mother and can provide testimony regarding the way in which Plaintiff was emotionally effected by the severe and pervasive discrimination and harassment in the workplace during Plaintiff's employment with The Middle East Forum.

- **LIA MERVILLE**

WITNESS

Lia Merville was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Defendant, Greg Roman subjected Lia Merville to quid pro quo sexual harassment. Lia Merville can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Lia Merville's contact information.

- **THELMA PROSSER**

WITNESS

Thelma Prosser was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. Thelma Prosser can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Thelma Prosser's contact information.

- **EJ KIMBALL**

WITNESS

EJ Kimball was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. EJ Kimball can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of EJ Kimball's contact information.

- **ALANA GOODMAN**

WITNESS

Alana Goodman who a Washington Examiner reporter who was subjected to discrimination and harassment based of her gender in interactions with Defendant, Greg Roman. Defendant, Greg Roman subjected Alana Goodman to quid pro quo sexual advances: sex for stories. Alana Goodman can provide relevant testimony related to Defendant, Greg Roman.

- **ROSIE (Last name unknown)**

WITNESS

Rosie was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Rosie can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Rosie's contact information.

- **LARA (Last name unknown)**

WITNESS

Lara was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East

Forum. Lara can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Lara's contact information.

- **LAURA FRANK:**

WITNESS

Laura Frank was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Laura Frank can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Laura Frank's contact information.

- **RAQUEL SARASWATI (AMAN PATEL)**

WITNESS

Raquel Saraswati was an employee of The Middle East Forum who was subjected to discrimination and harassment because of her gender during her employment with The Middle East Forum. Raquel Saraswati can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Raquel Saraswati's contact information.

- **CLIFF SMITH**

WITNESS

Cliff Smith was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. Cliff Smith can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Cliff Smith's contact information.

- **BENJAMIN BAIRD**

WITNESS

Benjamin Baird was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. Benjamin Baird can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Benjamin Baird's contact information.

- **SAMUEL WESTROP**

WITNESS

Samuel Westrop was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. Samuel Westrop can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Samuel Westrop's contact information.

- **JUDY GOODROB**

WITNESS

Judy Goodrob was an employee of The Middle East Forum who was employed at the same time that Plaintiff was employed. Judy Goodrob can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Defendants are in possession of Judy Goodrob's contact information.

- **EXPERT WITNESS** **EMOTIONAL DISTRESS**
Plaintiff intends to call an expert at trial to provide testimony related to the extent of Plaintiff emotional damages. Plaintiff will provide the curriculum vitae (“CV”) for any and all experts Plaintiff calls upon to testify at trial including the CV for the expert Plaintiff will use related to Plaintiff’s claim for emotional damages.
- **STEVEN LEVY** **WITNESS**
Steven Levy is an Officer of The Middle East Forum and sits on the Executive Committee as the Chairman of The Middle East Forum during the same time that Plaintiff was employed. Steven Levy can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Steven Levy can also provide relevant information related to The Middle East Forum’s policies regarding sexual harassment and sex and gender discrimination. Steven Levy can also provide relevant information related to The Middle East Forum’s response including investigations and corrective actions related to Greg Roman’s ongoing, continuous discrimination and harassment of female staff. Defendants are in possession of Steven Levy’s contact information.
- **DR. YEHUDA BASKIN** **WITNESS**
Dr. Yehuda Baskin is a founding member of the Board of The Middle East Forum who sat on the Board during the same time that Plaintiff was employed. Dr. Yehuda Baskin can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Dr. Yehuda Baskin can also provide relevant information related to The Middle East Forum’s policies regarding sexual harassment and sex and gender discrimination. Dr. Yehuda Baskin can also provide relevant information related to The Middle East Forum’s response including investigations and corrective actions related to Greg Roman’s ongoing, continuous discrimination and harassment of female staff. Defendants are in possession of Dr. Yehuda Baskin’s contact information.
- **WILMA G. AEDER** **WITNESS**
Wilma G. Aeder is a member of the Board of Governors of The Middle East Forum who sat on the Board of Governors during the same time that Plaintiff was employed. Wilma G. Aeder can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Wilma G. Aeder can also provide relevant information related to The Middle East Forum’s policies regarding sexual harassment and sex and gender discrimination. Wilma G. Aeder can also provide relevant information related to The Middle East Forum’s response including investigations and corrective actions related to Greg Roman’s ongoing, continuous discrimination and harassment of female staff. Defendants are in possession of Wilma G. Aeder’s contact information.

• **LAWRENCE HOLLIN**

WITNESS

Lawrence Hollin is the Treasurer of The Middle East Forum and sits on the Executive Committee both during the same time that Plaintiff was employed. Lawrence Hollin can provide relevant testimony related to Defendant, Greg Roman and Daniel Pipes. Lawrence Hollin can also provide relevant information related to The Middle East Forum's policies regarding sexual harassment and sex and gender discrimination. Lawrence Hollin can also provide relevant information related to The Middle East Forum's response including investigations and corrective actions related to Greg Roman's ongoing, continuous discrimination and harassment of female staff. Defendants are in possession of Lawrence Hollin's contact information.

B. A copy of, or a description by category and location of, all documents, electronically stores information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

- All pleadings on file with the Court and/or exchanged between parties in this action.
- All discovery which has or will be produced by Plaintiff and Defendants in this action.
- Plaintiff's expert psychological report.
- Plaintiff's documentation related to the exhaustion of her administrative remedies.
- Emails and text messages exchanged between Plaintiff and/or the individual named above.
- Photographic evidence.
- Video evidence.
- Documentation of events that took place during Plaintiff's employment for Defendants.
- Reports, witness statements, declarations, and investigative notes and statements of all previous reports of sexual misconduct, gender discrimination, sexual harassment, sexual assault, sexual abuse related to Defendant, Greg Roman and Matthew Bennett.
- Employee files.
- Plaintiff reserves the right to supplement and/or amend this response as additional information becomes available and as may be appropriate and necessary.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

At this early juncture, Plaintiff is claiming the following damages:

These unjust and illegal actions have had an extreme emotional toll on Plaintiff.

Emotional Distress:

\$3,000,000.00

Lost Wages: **\$10,000.00**

Punitive Damages under the Discrimination Laws: **\$6,000,000.00**

Plaintiff claims attorney's fees upon a successful verdict under Title VII, the Americans with Disabilities Act, the Family Medical Leave Act, and Pennsylvania Administrative Code.

- Plaintiff reserves the right to supplement/amend this response as more information becomes available and as may be appropriate and necessary.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgement.

N/A.

DEREK SMITH LAW GROUP, PLLC

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DATE: February 7, 2020

CC:

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*Attorneys for Defendants
The Middle East Forum and
Gregg Roman*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	
	:	
Plaintiff,	:	
-vs-	:	CIVIL ACTION NO. 2:19-cv-05030-JDW
	:	
THE MIDDLE EAST FORUM and	:	
GREGG ROMAN (<i>individually</i>)	:	
	:	
Defendants.	:	

DEFENDANTS RULE 26(a)(1) INITIAL DISCLOSURES

Defendants The Middle East Forum and Gregg Roman (“Defendants”) serve these Rule 26(a)(1) Initial Disclosures:

INTRODUCTION

1. These Initial Disclosures are made without waiver of any applicable privilege or work-product protection.

2. Defendants hereby reserve all objections to the use for any purpose whatsoever of this Initial Disclosure Statement or any of the information in documents referenced herein in this case or in any other case or proceeding.

3. By referring to or producing documents in the Initial Disclosure process, Defendants make no representations or concessions regarding the relevance or admissibility of any particular document or type of documents.

4. These Initial Disclosures are made based upon the information available to the Defendants to date. Defendants reserve the right to supplement, revise and/or amend these Initial Disclosures if, and when, new information becomes available.

5. Defendants make these disclosures without prejudice to their right to introduce at trial any evidence that is subsequently discovered and to their right to produce and introduce all evidence whenever discovered relating to the proof of subsequently discovered material facts. These disclosures are not intended to foreclose Defendants' right to add any defenses based on further discovery.

INITIAL DISCLOSURES

1. **Fed. R. Civ. P. 26(a)(1)(A)(i):**

The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE: Defendants identify the individuals listed on Exhibit A – Identification of Individuals with Relevant Knowledge. Defendants reserve the right to amend this list during the discovery period in this action.

2. **Fed. R. Civ. P. 26(a)(1)(A)(ii):**

A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

Defendants identify the following categories of documents, electronically stored information, and tangible things:

- (A) Defendants relevant employment policies;
- (B) Plaintiff's personal file and documents related to Plaintiff's compensation and benefits;
- (C) Correspondence between Plaintiff and Defendants; and
- (D) Correspondence between Plaintiff and former co-workers.

Defendants will supplement upon further investigation and as documents become available.

(3) **Fed. R. Civ. P. 26(a)(1)(A)(iii):**

A computation of each category of damages claimed by the disclosing party - who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: Not applicable.

(4) Fed. R. Civ. P. 26(a)(1)(A)(iv):

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: Defendants possess an insurance policy with the Hartford Financial Services Group, Inc.

Respectfully submitted,

COZEN O'CONNOR

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Dated: January 20, 2020

*Attorneys for Defendants
The Middle East Forum and
Gregg Roman*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of Initial Disclosures of Defendants The Middle East Forum and Gregg Roman Pursuant to Federal Rule of Civil Procedure (26)(a)(1) was served by email on the following parties on this 20th day of January, 2020:

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Dated: January 20, 2020

Attorneys for Defendants
The Middle East Forum and
Gregg Roman

EXHIBIT A

IDENTIFICATION OF INDIVIDUALS WITH RELEVANT KNOWLEDGE

Name	Contact Information	Comments
Daniel Pipes	Can be contacted through counsel.	President of The Middle East Forum.
Gregg Roman	Can be contacted through counsel.	Defendant and Director at The Middle East Forum.
Matthew Bennett	Can be contacted through counsel.	Former employee at The Middle East Forum.
Lisa Reynolds Barbounis		Plaintiff in this action.
Patricia McNulty		Former co-worker of Plaintiff; Plaintiff in similar action against Defendants.
Caitriona Brady		Former co-worker of Plaintiff; Plaintiff in similar action against The Middle East Forum.
Delaney Yonchek		Former co-worker of Plaintiff;
Marnie O'Brien Meyer		Former co-worker of Plaintiff; Plaintiff in similar action against Defendants.
Stacey Roman	Can be contacted through Counsel.	Former co-worker of Plaintiff; employee at The Middle East Forum.
Aaron Balshan		Former co-worker of Defendant, employee at McKinsey.
Matan Peleg	Jerusalem, Israel	CEO, Im Tirtzu Non-profit organization
Gilad Ach	Shilo, Israel	CEO, Ad Kan organization

Yaron Sideman	Israel Ministry of Foreign Affairs	Former Consul General, Israel Consulate, Philadelphia, spent time with Plaintiff in Israel
Eran Vasker	Tel Aviv, Israel	Former Israel Police Officer, spent time with Plaintiff in Israel
Raheem Kassam	Washington, DC	Co-Host, The War Room, former Breitbart UK Editor
Steven Schimmel	Amherst, MA	CEO, Jewish Federation of Central Massachusetts
Jonathan Hunter	London, England	Pinsker Centre Founder
Elliot Miller	Los Angeles, CA	Pinsker Center Founder, Political Affairs Director, Israel Consulate to Los Angeles
Aliza Landes	Tel Aviv, Israel	Captain (RSV) Israel Defense Forces
Karys Rhea	New York City, NY	Associate, Middle East Forum
Yinon Ben Pesach	New York City, NY	Friend of Defendant, spent time with Plaintiff in Israel
Gary Gambill	Wilmington, DE	Former co-worker of Plaintiff; employee at The Middle East Forum.
Grayson Levy	Jerusalem, IL	Former co-worker of Plaintiff; contractor at The Middle East Forum.
Brandon Gideon Meir Carrier	Jerusalem, Israel	Friend of Defendant, spent time with Defendant in Israel

Oded Forer	Rehovot, Israel	Member of Israeli Parliament, spent time with MEF employees in Israel
Rachel Touitou	Raanana, Israel	Former co-worker of Plaintiff; employee at The Middle East Forum.
Alex Selsky	Jerusalem, Israel	Former co-worker of Plaintiff; employee at The Middle East Forum.
Uri Resnick	Jerusalem, Israel	Director of Policy Planning Department, Israel Ministry of Foreign Affairs
Samuel Westrop	Boston, Massachusetts	Former co-worker of Plaintiff; employee at The Middle East Forum.
Edward Judd Kimball	Rockville, MD	Former co-worker of Plaintiff; employee at The Middle East Forum.
Ashley Perry	Efrat, Israel	Former co-worker of Plaintiff; contractor at The Middle East Forum.
Yoseff Shachor	New York, NY	Founder, Pinsker Centre, spent time with plaintiff in Washington DC.
Matthew Ebert	West Deptford, NJ	Acquaintance of Colleague
Greg Reynolds	New Jersey	Family Member of Plaintiff
Jane Reynolds	New Jersey	Family Member of Plaintiff
David Reynolds	Philadelphia	Family Member of Plaintiff
Ryan Costello	West Chester, PA	Former Congressman
Randy Weber	Washington, DC/Texas	Member of Congress

Chara McMicheal	Washington DC	Chief of Staff, Congressman Randy Weber Former Contractor, Middle East Forum
Joel Mowbray	Los Angeles, CA	
Rob Wasinger	Washington, DC	Former Contractor, Middle East Forum
Allison Teti	Philadelphia, PA	Friend of Plaintiff
Alana Goodman	Washington, DC	Friend of Plaintiff, Investigative Journalist, Washington Examiner
Jarad Geldner	Washington, DC	Former Contractor, Middle East Forum
Brett Goldman	Lexington, KY	VP, Government Relations, GenCanna
Michelle Makori	New York, NY	Anchor, i24 News
Tal Heinrich	New York, NY	Anchor, i24 News
Clifford Smith	Washington DC	Former co-worker of Plaintiff, employee at the Middle East Forum.
Paul Harris, Stephen Yaxley Lennon, Tommy Robinson	London, UK	Plaintiff's acquaintance
Daniel Thomas	London, UK	Plaintiff's acquaintance
Avi Yemeni	Hong Kong, China	Plaintiff's acquaintance